



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

AUG 17 2012

SUBJECT: Approval of Funding for a Removal Action
At the R207 LLC Drum Site, Caroline County, VA

FROM: Dennis Carney, Associate Director
Office of Preparedness and Response
Hazardous Site Cleanup Division (3HS30) *for DC*

TO: Mathy Stanislaus, Assistant Administrator
Office of Solid Waste and Emergency Response (5101T)

THRU: Lawrence Stanton, Director
Office of Emergency Management (5104A)

ATTN: Gilberto Irizarry, Director
Program Operations & Coordination Division (5104A)

ISSUE:

The attached Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) funding request pertains to the time-critical Removal Action to mitigate the release and threatened release of hazardous substances and/or pollutants or contaminants associated with approximately 55 drums at the R207 LLC Drum Site (Site) in Caroline County, VA.

A removal assessment performed in accordance with the National Oil and Hazardous Substance Pollution Contingency Plan (NCP), 40 CFR Part 300.410 identified a threat to public health or welfare or the environment due to the uncontrolled presence of hazardous substances, pollutants, or contaminants at the Site. The On-Scene Coordinator (OSC) had determined that this Site meets the criteria for a Removal Action under Section 300.415 of the NCP. The OSC confirmed that improperly housed drums of hazardous materials have been left in the trailer on the property and that CERCLA funds are necessary to remove the drums and mitigate the threat.

Funding has been requested in the amount of \$527,533 of which an estimated \$376,375 comes from the Regional Removal Allowance. Pursuant to delegation of authority 14-2 to approve CERCLA Removal Action costing up to \$2 million and action up to 12 months, Region III has approved this request.

Attachment: Funding Request



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1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

AUG 17 2012

SUBJECT: Request for Funding for a Removal Action at the
R207 LLC Drum Site
Caroline County, Virginia

FROM: Christine Wagner, On-Scene Coordinator
Western Response Branch (3HS32)

Fran Suras for CW

TO: Dennis P. Carney, Associate Director
Office of Preparedness and Response
Hazardous Site Cleanup Division (3HS30)

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval and funds for a time-critical Removal Action at the R207 LLC Drum Site in Caroline County, Virginia. These actions are necessary to mitigate the threatened release of hazardous substances from an abandoned trailer containing approximately fifty-five 55-gallon drums. The Virginia Department of Environmental Quality and Caroline County have requested EPA's assistance to remove the drums from the Site to mitigate the threat to public health, welfare, and the environment posed by a potential release of the drums' contents.

A removal assessment performed by the OSC in accordance with Section 300.410 of the National Oil and Hazardous Substance Pollution Contingency Plan (NCP), 40 CFR Section 300.410, has identified a threat to public health or welfare or the environment due to the uncontrolled presence of hazardous substances, pollutants, or contaminants at the Site. Funds in the amount of \$527,533 are being requested, \$376,375 of which are extramural costs, directly from the Regional Allowance.

II. SITE CONDITIONS AND BACKGROUND

A. SITE DESCRIPTION

1. Removal Site Evaluation

In April of 2011, Caroline County Fire officials and representatives from the Virginia Department of Emergency Management (VDEM) first became aware of possible hazardous substances being stored at the Site. Further investigations revealed that approximately fifty-five 55-gallon drums are being stored in an unlocked trailer on the Site.

With the assistance of Caroline County and Virginia Department of Environmental Quality (VDEQ) officials, EPA learned that the owner of the property leased the property to a second individual. This individual allegedly permitted a third party to store a trailer full of drums on the property under a verbal agreement providing that second individual would then be given the empty trailer as payment.

The owner of the drums acknowledged to both VDEQ and EPA that the drums belong to him and assured VDEQ that he would arrange for proper removal and disposal. However, over the past fifteen months, the owner of the drums has neglected to take the proper actions, despite many attempts by VDEQ to encourage a proper cleanup in a reasonable time frame.

In July of 2011, VDEQ requested that the owner of the drums contact an environmental contractor to have the contents sampled. The owner of the drums was provided a list of contractors who have performed this type of work in the Commonwealth of Virginia. After several months of delay, VDEQ sent the owner of the drums a Notice of Violation on or about October 31, 2011.

A representative of the owner of the drums presented "jelly jars" of unknown substances to EPA and VDEQ in March of 2012. This representative stated that the contents had been taken from the drums. At a meeting at the Site, EPA and VDEQ representatives observed that the integrity of the drums was compromised by visible holes in some of the drums and unsecured lids on other drums. Based on these observations and the lack of documentation from the drum owner's representative, the OSC suspects the drum owner likely ignored VDEQ's recommendation to hire an environmental contractor to obtain samples and may have subjected persons to unsafe conditions without proper air monitoring or personal protective gear.



Figure 1: "Samples" collected in food jars by owner of drums

Furthermore, in order to collect the contents, the samplers allegedly compromised the integrity of the drums by forcibly opening some of the containers. Currently, the drums are stored on an unsecured trailer and some of the containers have been compromised. The jelly jars, which were present during EPA's March 2012 visit to the Site, are missing from where they were last observed by EPA.

2. Physical Location/Site Characteristics

The Site is an unoccupied parcel property located at the end of Chesterfield Road in Caroline County, Virginia. The deed indicates the Site is on Parcel 83-A-11, adjacent to parcel 83-A-41. The property has a gate, but it is not locked.

The drums are stored in an unlocked trailer on the Site. EPA does not consider the drums "abandoned", because they have been claimed by the drum owner. However, no actions are being taken to secure the drums or ensure they do not release their contents into the environment. The trailer doors cannot be properly closed because they are damaged and degraded.



Drums stored haphazardly inside of trailer

Approximately three residences are located on the road leading to the Site. The nearest residence is less than one-quarter mile from the trailer.

3. Quantities and Types of Substances Present

Approximately fifty-five 55 gallon drums are stored on the trailer. This number is calculated from the number of jelly jars collected by the owner's representative

EPA has not sampled the drums for laboratory analysis because the OSC has determined the conditions unsafe for a sampling event inside of the trailer. The drums are in poor condition and many have holes punched in them. Proper health and safety protocols require the drums to be removed from the trailer and safely overpacked prior to sampling. Furthermore, the OSC expects that at least some of the containers may be so dilapidated that they may collapse upon movement.

Field tests performed by the Virginia Department of Emergency Management on jelly jars filled with material reportedly taken from the drums by or on behalf of the drum owner indicate the presence of flammable and toxic substances. Field tests indicated high levels of volatile organic compounds in 12 containers. At least two substances tested positively for alcohol-based compounds. Also, the field test of one jelly jar caused a maximum reading for flammability on an air monitoring instrument. Furthermore, odors present in the area around the trailer indicate the presence of volatile organic substances. Based upon observations on scene, knowledge of the use and interpretation of readings on the air monitoring instrumentation described above, and also professional experience with hazardous substances with the properties described above, the OSC believes that the contents of some of the jars would be confirmed as RCRA ignitable waste as described in 40 CFR §261.21(a)(1) were they tested in a laboratory.

Field tests on the jelly jars also indicated the presence of a phenol-based resin. Although phenol resin, when used in its proper form, is often a solid, the material tested was a liquid and quite volatile. Phenol-based compounds are toxic to both humans and the environment. Phenol is a listed hazardous substance under 40 CFR 302.4.

4. National Priorities List

The R207 LLC Drum Site is not on the National Priorities List (NPL). Throughout the Removal Action, the OSC will document and collect information necessary for the Site Assessment Manager to make a determination whether the Site should be evaluated for the NPL.

5. State and Local Authorities' Roles

Local agencies, the Commonwealth of Virginia, and the EPA have been coordinating efforts since actions were first initiated. Caroline County is represented by the Fire Marshal's Office, Fire and Emergency Services, and the Caroline County Building official. The OSC has been coordinating frequently with the Virginia Department of Environmental Quality.

Both the Caroline County Fire-Rescue and Emergency Management and VDEQ have requested EPA assistance. EPA has been offering technical assistance while VDEQ has pursued

enforcement actions. However, the potentially responsible parties have been non-responsive, and have actually worsened Site conditions by allowing the drums to become compromised (holes punched in the drums) and not maintaining the trailer and its contents. Also, since the drums have been compromised, probably for sampling purposes, some of the containers are now open to the environment.

B. OTHER ACTIONS TO DATE

I. Previous Actions

The Site was first brought to EPA's attention in April of 2011 by Caroline County officials. The building inspector for Caroline County responded to an anonymous call by a resident. An investigation by the building inspector revealed the presence of the drums. There is no commercial operation on this property. The inspection was followed up by an inspection by the Caroline County Fire Investigators.

Upon arrival at the scene, Caroline County Fire officials saw unusual markings on the trailer and the surrounding area which raised safety concerns. Caroline County requested the assistance of law enforcement and the Virginia Department of Emergency Management (VDEM) at the scene. Caroline County also requested EPA assistance at that time. During this visit, EPA did not access the Site as the owner was not on Site to consent to-EPA access. The OSC did observe, from outside the Site, that the person leasing the Site arrived on Site and performed some unusual actions, including spray-painting, graffiti-style, the outside of a vehicle with spray paint.

To EPA's knowledge, the drums have been stored on the Site at least since the spring of 2011. During the period of April – July of 2011, VDEQ and Caroline County officials identified three separate locations in Caroline County where the owner of the drums had unmarked drums staged in unsecured areas. The owner of these drums removed the containers from two of the locations, but not from the R207 LLC Site. EPA and VDEQ representatives were present during removal of drums containing used oil and oil wastes from one of these two locations, an area in Caroline County near Thornburg, Virginia. During this action, the owner of the drums acknowledged that the drums at the R207 LLC Site were his and that he intended to properly remove them.

In July of 2011, a representative from VDEQ met with the owner of the drums at the R207 LLC Drum Site to discuss the proper identification and disposal of approximately fifty-five 55-gallon drums stored in a trailer at the Site. The owner of the drums expressed his intentions to sample and remove the drums by the end of August 2011.

By the end of October 2011, the owner of the drums still had not taken any action. VDEQ issued a Notice of Violation to the owner of the drums.

In March of 2012, EPA and VDEQ met on Site with local fire and law enforcement officials, the owner of the property, and the person who leased the property. The owner of the drums did not show up for this meeting, but sent a representative in his place. This representative had the jelly jar "samples", as described previously, with her and asked what should be done with them.

The EPA OSC and representatives from VDEQ and VDEM explained that the samples, as collected, were not valid for proper laboratory analysis. No documentation, including chain of custody, was available. The samples were not collected in proper sample containers, nor were the samples preserved. The representative for the owner of the drums informed the OSC that she did not know who collected the samples.

The VDEM Hazardous Materials Officer on scene offered to perform some field testing of some of the jars. The VDEM representative used an air monitoring meter which is used to detect flammable and organic compounds. Most of the liquid samples were under pressure generated by the volatilization of the contents. High readings for volatile organic vapors (usually an indication of flammability) were found in the headspace of twelve of the jelly jars. The jelly jars containing solids were not tested by VDEM because solids generally do not generate enough vapors to be detected by the field instrumentation.

The VDEM representative selected six jars to screen with a field instrument which uses infrared technology to compare the contents of the jars to a library of known chemicals. One of the samples was identified as a phenol-based resin. Two other samples indicated the presence of alcohol-based compounds. One of the jars has a positive reading for an unknown resin. The flammability reading on this jar exceeded the maximum reading of the instrument for flammability. Another sample indicated the presence of ether and gasoline.

Again, the representatives on scene were advised to work with VDEQ to perform proper sampling and removal of these containers. At the conclusion of this onsite visit, the representative of the owner of the drums was advised to leave the jars on the trailer rather than put them back in her personal vehicle. This recommendation was made by fire officials on scene out of concern for the driver's safety. She agreed and left the boxes of jars inside of the trailer.

Also, during this visit, the OSC observed a placard on the trailer with the number "2212". This is a number used to transport U.S. Department of Transportation (US DOT) hazardous materials and is referenced in 49 CFR §172.101 hazardous materials table. The number "2212" is the US DOT designation for asbestos. This marking is inconsistent with the types of materials stored on the trailer. Asbestos is usually transported in bags or boxes. The appearance of the substances in the jelly jars is not consistent with the appearance of asbestos.

In June of 2012, VDEQ sent a Consent Agreement to the owner of the drums. This document was returned unopened.

In July of 2012, VDEQ set up another meeting to meet the owner of the drums on Site. EPA was also invited to this meeting. The owner of the drums did not show up. The boxes of jelly jars were missing from inside of back of the trailer where they were last seen by EPA.

2. Current Actions

Conditions at the Site are worsening due to the open drums and unsecured trailer. VDEQ has requested EPA's assistance to perform actions at the Site to mitigate the threats posed by hazardous substances, pollutants, or contaminants stored in unsafe containers in an unsecured trailer on an unsecured property.

Although the contents have not been positively identified by laboratory analysis, field tests of materials reportedly taken from the containers indicate the presence of flammable substances and phenol, a listed hazardous substance under 40 CFR §302.4.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Both the Caroline County Fire-Rescue and Emergency Management Agency and VDEQ have requested EPA assistance. EPA has been offering technical assistance while VDEQ has pursued enforcement actions. However, the efforts have not led to a cleanup and conditions have worsened as the containers have been further compromised, apparently during sampling.

Section 300.415 of the National Contingency Plan (NCP) lists the factors to be considered in determining the appropriateness of a response action. At this time, the following sections apply:

§ 300.415(b)(2)(i) *Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;*

Based on the field tests on jars reported to contain material taken from the drums, the OSC believes that hazardous substances, pollutants, or contaminants are stored in unsecured containers on an unsecured Site. The Site is at the end of a long road and is a prime attraction to trespassers or vandals. Simple curiosity may lure a person or child into the trailer to investigate or in search of valuables. A trespasser may be exposed to flammable or toxic substances. Since the drums are

compromised, a curious person may even be tempted to stick a finger or arm inside of the drums. The potential exposure to trespassers is significant. Immediate actions are needed to overpack and secure the drums.

Field tests performed by the Virginia Department of Emergency Management on jelly jars filled with material reportedly taken from the drums by or on behalf of the drum owner indicate the presence of flammable and toxic substances. Field tests indicated high levels of volatile organic compounds in 12 containers. At least two substances tested positively for alcohol-based compounds. Also, the field test of one jelly jar caused a maximum reading for flammability on an air monitoring instrument. Furthermore, odors present in the area around the trailer indicate the presence of volatile organic substances. Based upon observations on scene, knowledge of the use and interpretation of readings on the air monitoring instrumentation described above, and also professional experience with hazardous substances with the properties described above, the OSC believes that the contents of some of the jars would be confirmed as RCRA ignitable waste as described in 40 CFR §261.21(a)(1) were they tested in a laboratory.

One field test also indicated the presence of ether. Ether compounds are extremely flammable. They can also produce dizziness and can affect breathing.

The above-mentioned field tests indicate the presence of at least one phenol-based compound. Phenolic compounds affect the central nervous system, heart, blood, lungs, and kidneys. Phenol is also corrosive to the skin. Consumption of water contaminated with phenol may result in diarrhea, mouth sores, burning sensation in the mouth, and dark urine.

§ 300.415(b)(2)(iii) *Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;*

The potential release of a hazardous substance, pollutant, or contaminant from drums on the trailer is substantial. The drums are in extremely poor condition with dents, gashes, bulging or missing lids. The drums are not being maintained. The drums are crammed so close together that a person cannot even “squeeze” around the drums to determine if they are leaking.

The trailer in which the drums are stored is structurally compromised. The OSC has determined that the drums must be carefully removed prior to sampling. Furthermore, a cleanup contractor will need to be present during such sampling in the event a drum or a portion of the trailer collapses.

§ 300.415(b)(2)(v) *Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;*

Since the unsecured trailer is open and cannot easily be closed, weather will continue to degrade the trailer and the drums. Furthermore, any hazardous substances which may have leaked from the trailer may continue to migrate due to weather.

§ 300.415(b)(2)(vi). *Threat of fire or explosion:*

The contents of some of the drums are flammable. Some of the drums exhibit signs of stress, including bulged lids, which is caused by volatile chemicals expanding in their containers. The above-mentioned field tests indicate high levels of volatile organic compounds on tests of the above-mentioned 12 different substances allegedly collected from the drums. Field tests also specifically indicate the presence of alcohol and ether, both of which are flammable compounds. One of the field tests caused the meter to “max out” on the flammability rating. The odors in the trailer indicate the contents of the drums are volatile. In hot weather, the substances will volatilize more rapidly, potentially creating a flammable atmosphere.

The OSC has experience with flammable substances as described here. Based on the OSC’s experience and knowledge of the use of the air monitoring instruments used in the above-described field tests, the OSC believes that the contents of some of the jars would be confirmed as RCRA ignitable hazardous wastes as described in 40 CFR § 261.21(a)(1) were they tested in a laboratory.

If a trespasser or other person would enter the unsecured trailer, an action as innocuous as lighting a cigarette could cause a fire or worse, an explosion, with disastrous results.

§ 300.415(b)(2)(vii) *The availability of other appropriate federal or state response mechanisms to respond to the release;*

The Commonwealth of Virginia and Caroline County officials have requested EPA’s assistance to take actions necessary to mitigate the threat to public health, welfare, or the environment by securing, sampling, and disposing of hazardous substances stored in unsafe conditions.

Neither the Commonwealth nor Caroline County has the resources necessary to complete a removal action at this time.

IV. ENDANGERMENT DETERMINATION

Actual and threatened releases of hazardous substances, pollutants, and contaminants from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Action Description

The Removal Action at the Site will be divided into three phases:

a. Phase I

- 1) Immediately provide fire protection and construct a fence around the affected area to prevent unauthorized access. Recycled fence will be used if available;
- 2) Remove drums from trailer and place them into overpacks of compatible construction. Stage the overpacks on poly such that they are accessible if emergency actions are needed at the Site;
- 3) Sample all drums and containers removed from the trailer to determine their contents and proper waste categorization;

b. Phase II

- 1) Remove and properly dispose of overpacked drums and their contents at an offsite facility in accordance with CERCLA §121(d)(3) and 40 CFR §300.440;
- 2) Perform disposal of wastes generated as part of the removal action (i.e. used personal protective equipment, staging area wastes, etc.) in accordance with CERCLA §121(d)(3) and 40 CFR §300.440;
- 3) Relocate trailer to another portion of the property so that post removal sampling can be performed.

c. Phase III

- 1) Perform post removal surface soil sampling;
- 2) Excavate and dispose offsite soils suspected to have been contaminated by the release of hazardous substances and/or pollutants or contaminants from the trailer or its contents above the EPA Regional screening levels to a depth not to exceed twelve inches. Disposal shall be in accordance with CERCLA §121(d)(3) and 40 CFR §300.440. Backfill excavated areas with clean fill.
- 3) Remove fence and recycle in accordance with EPA's Green Remediation Strategy.

2. Contribution to Remedial Performance

The Site is not on the NPL. However, any actions performed at the Site will be coordinated with the EPA Site Assessment Manager to ensure actions are consistent with any potential future remedial performed.

3. Applicable or Relevant and Appropriate Requirements (ARARs)

On August 15, 2012, the OSC received the preliminary identification of ARARs from the Commonwealth of Virginia.

The proposed removal action will attain ARARs to the extent practicable considering the exigencies of the situation.

B. Estimated Costs

The proposed distribution of funding is as follows:

Extramural Costs	
Regional Allowance Costs (This cost category includes estimates for ERRS contractors, subcontractors, letter contracts, orders for services, notices to proceed, alternative technology contracts, and inter-agency agreements with other Federal Agencies)	\$376,375

Other Extramural Costs Not Funded from the Regional Allowance	
START Contractor	\$ 22,350
Total CLP	\$ 60,000
Subtotal, Extramural Costs	\$458,725
Extramural Costs Contingency (15% of Subtotal, Extramural Costs)	\$ 68,808
TOTAL REMOVAL ACTION PROJECT CEILING	\$ 527,533

VI. EXPECTED CHANGE IN SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If the proposed actions at the Site are not implemented or are delayed, the imminent and substantial threat to public health, welfare, or the environment due to the uncontrolled release of hazardous substances, pollutants, or contaminants will continue.

VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues at this Site.

VIII. ENFORCEMENT

Based on the information currently available, it is recommended that Superfund monies be allocated to perform the removal activities in the event the potential responsible parties do not complete the necessary response actions. A confidential enforcement addendum has been prepared and is included as an attachment to this document.

The total EPA costs for this removal action based upon full-cost accounting practices that will be eligible for cost recovery are estimated below as follows:

Direct Extramural Costs:	\$ 527,533
Direct Intramural Costs:	\$ 40,000
Indirect Costs (61.7%)	\$ 349,946

\$ 917,479

IX. RECOMMENDATION

Pursuant to Section 113(k) of CERCLA and EPA Delegation No. 14-22, I hereby establish the documents listed below as the Administrative Record supporting the issuance of this Action Memorandum.

1. 5/3/11 – email from Mr. M. Miller, VDEQ, to Mr. Shaia regarding preliminary sampling;
2. 5/3/11 – email from M. Miller, VDEQ, to C. Wagner, EPA, J. Taylor, VDEM, and T. Gumbita, VDEQ, regarding several locations of concern in Caroline County;
3. 7/28/11 – Letter to Mr. D. Saulsgiver from T. Gumbita, VDEQ, stating that two other Caroline County properties are now in compliance with used oil regulations;
4. 8/2/11 – email from T. Gumbita, VDEQ, to D. Saulsgiver regarding requirements for upcoming sampling event on 8/5/12;
5. 8/5/11 – email from D. Saulsgiver to T. Gumbita state that sampling was not conducted because no other agencies were present;
6. 8/8/11 – email from T. Gumbita, VDEQ, to D. Saulsgiver regarding sampling event which was not conducted on 8/5/11;
7. 8/8/11 – email from T. Gumbita to C. Wagner, EPA, regarding possible EPA assistance;
8. 8/19/11 – email from T. Gumbita, VDEQ, to D. Saulsgiver requesting update on plans to sample drums;

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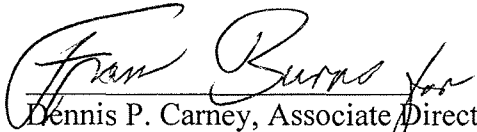
9. 10/6/11 – email from T. Gumbita, VDEQ, to M. Miller, VDEQ, and C. Wagner, EPA, regarding conversation with Mr. Saulsgiver's assistant;
10. 3/2/12 – email from T. Gumbita, VDEQ, to C. Wagner, EPA, requesting onsite meeting on 3/8/12;
11. 3/8/12 – Assessment and Field Testing of Drums from the R207 LLC Site;
12. 3/9/12 – POLREP #1
13. Photographs from EPA visit to the Site 3/8/12;
14. 3/21/12 – Notice of Violation from VDEQ to Mr. Saulsgiver
15. 3/30/12 – email chain between T. Gumbita, VDEQ, and L. Blank regarding waste as paint;
16. 6/14/12 – Consent Agreement from S. Baker, VDEQ, to D. Saulsgiver
17. 7/30/12 – C. Wagner memo to file re: EPA/VDEQ Conference call
18. 8/15/12 – Letter to C. Wagner from M. Hollis, VDEQ identifying preliminary ARARs for the Commonwealth of Virginia
19. 8/3/12 – C. Wagner memo to file regarding meeting with Caroline County Fire Officials
20. Caroline County Deed Book Page 862 Page 930
21. Caroline County Deed Book Page 825 Page 080
22. Plat Map
23. Virginia Mass Appraisal Network Property Information Tax Map #83-A-11
24. Virginia Mass Appraisal Network Property Information Tax Map #83-A-41
25. Virginia Mass Appraisal Network Search Results for R207 LLC
26. Hazardous Substances Data Base Phenol Report
27. Danger: Peroxidable Chemicals T. Ray
28. Phenolic Resin MSDS
29. EPA Region III Mid-Atlantic Risk Assessment Regional Screening Level Resident Soil Table 2012
30. Superfund Green Remediation Strategy

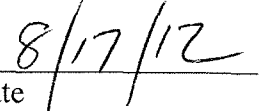
Because conditions at the R207 LLC Drum Site meet the Removal Action requirements of Section 300.415(b) of the NCP, I recommend your approval of the proposed Removal Action. The total Removal Action Project Ceiling, if approved, will be \$ 527,533. Of this, an estimated \$376,375 comes from the Regional Removal Allowance. Please indicate your approval or disapproval on the next page.

Action by the Approving Official:

I have reviewed the above-stated facts and based upon those facts and the information compiled in the documents described above, I hereby determine that the release or threatened release of hazardous substances at and/or from the Site presents or may present an imminent and substantial endangerment to the public health or welfare or to the environment. I concur with the recommended removal action as outlined.

APPROVED


Dennis P. Carney, Associate Director
Office of Preparedness and Response
Hazardous Site Cleanup Division


Date